

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

-----X	:	
JOHN DOE,	:	<u>Docket No. 1:15-CV-00455-JL</u>
	:	
Plaintiff,	:	
	:	
-against-	:	MOTION TO WITHDRAW
	:	PARAGRAPH 143 OF THE
SAINT ANSELM UNIVERSITY,	:	COMPLAINT
	:	
	:	
Defendant.	:	
-----X	:	

NOW COMES plaintiff John Doe, by and through his attorneys, Nesenoff & Miltenberg, LLP, and hereby submits this assented-to Motion to withdraw the allegations contained in Paragraph 143 of the Complaint, filed November 3, 2015.

1. Paragraph 143 of the Complaint alleges that “[d]uring the pendency of John Doe’s case, Saint Anselm was under investigation by the Department of Education Office of Civil Rights for its handling of sexual misconduct cases under Title IX, and faces severe financial consequences if the Department determines that Saint Anselm does not deal with sexual assault cases in a way the Department feels is appropriate.”

2. Due to a misunderstanding by our firm, Paragraph 143 was erroneously included in the Complaint, and we wish to withdraw Paragraph 143 in its entirety.

3. Withdrawal of Paragraph 143 of the complaint has been assented to by Defendant’s counsel.

4. We apologize greatly for the error.

WHEREFORE, Plaintiff respectfully requests that this Court grant its Motion to Withdraw Paragraph 143 from the complaint.

Dated: New York, New York
June 28, 2016

Respectfully submitted,

NESENOFF & MILTENBERG, LLP
Attorneys for Plaintiff John Doe

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